

# **Exhibit B**

UNITED STATES DISTRICT COURT  
THE DISTRICT OF NEW HAMPSHIRE

KRISTINA RAPUANO, VASSIKI  
CHAUHAN, SASHA BRIETZKE,  
ANNEMARIE BROWN, ANDREA  
COURTNEY, MARISSA EVANS, JANE  
DOE, JANE DOE 2, and JANE DOE 3,

*Plaintiffs, on behalf of themselves and  
all others similarly situated,*

v.

TRUSTEES OF DARTMOUTH COLLEGE,

*Defendant.*

Hon. Landya B. McCafferty, U.S.D.J.

CASE No. 1:18-cv-01070 (LM)

**DECLARATION OF CHARLES G.  
DOUGLAS, III IN SUPPORT OF  
(1) PLAINTIFFS' MOTION FOR  
FINAL APPROVAL OF THE  
CLASS SETTLEMENT, AND (2)  
PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES, COSTS,  
AND SERVICE AWARDS**

I, Charles G. Douglas, III, hereby declare as follows:

1. I make this Declaration in support of Plaintiffs' Motion for Final Approval of the Proposed Class Settlement and Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Awards.

2. I make this Declaration based upon personal knowledge. If called and sworn as a witness, I would testify competently as to the facts in this Declaration.

3. I am an attorney duly admitted to practice law in the state of New Hampshire and have been so for 52 years.

4. I am the founding partner of Douglas, Leonard & Garvey, P.C. I am local counsel in the above-captioned matter.

5. Since November 7, 2018, Douglas, Leonard & Garvey, P.C. has expended over **231.3 hours** on this matter, resulting in a lodestar of **\$200,270.00**. The following chart reflects Douglas, Leonard & Garvey, P.C.'s hours and lodestar:

<i><b>NAME</b></i>	<i><b>HOURS</b></i>	<i><b>RATE</b></i>	<i><b>LODESTAR</b></i>
Charles G. Douglas, III, Esq.	204.80	\$900.00	\$184,320.00
Benjamin T. King, Esq.	6.20	\$800.00	\$4,960.00
C. Kevin Leonard, Esq.	9.80	\$800.00	\$7,840.00
Susan A. Mello, Paralegal	10.50	\$300.00	\$3,150.00

6. The preceding summary was prepared from detailed time records which are available at the request of the Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Concord, New Hampshire  
May 26, 2020

/s/Charles G. Douglas, III  
Charles G. Douglas, III